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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,  
9 Plaintiff,  
10 vs.  
11 JAN ROUVEN FUECHTENER,  
12 Defendant.

CASE NO.: 2:16-CR-100-GMN-CWH  
**STIPULATION TO CONTINUE  
REPLY DEADLINE**

13 IT IS HEREBY STIPULATED AND AGREED, by and between Elham Roohani and Lisa  
14 C. Cartier-Giroux, Assistant United States Attorneys, counsel for the United States of America, and  
15 Karen A. Connolly, counsel for Defendant JAN ROUVEN FUECHTENER, that the deadline for  
16 Defendant's Reply to Government's Response to Motion to Withdraw Guilty Plea currently  
17 scheduled for August 18, 2017, be continued for 10 days.

18 This Stipulation is entered into for the following reasons:

- 19 1. The parties agree to the continuance for the following reasons: The Defendant needs  
20 more time to reply to Government's Response to Defendant's Motion to Withdraw Plea.  
21 2. The additional time requested herein is not sought for purposes of delay.

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3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

DATED this 14<sup>th</sup> day of August, 2017.

## KAREN A. CONNOLLY, LTD.

DANIEL G. BOGDEN  
United States of America

/s/ Karen A. Connolly  
KAREN A. CONNOLLY  
Counsel for Jan Rouven Fuechtener

*/s/ Elham Roohani*  
ELHAM ROOHANI  
LISA C. CARTIER-GIROUX  
Assistant United States Attorneys  
Counsel for Plaintiff

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
JAN ROUVEN FUECHTENER,  
Defendant.

CASE NO.: 2:16-cr-100-GMN-CWH

## **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

## **FINDINGS OF FACT**

Based on the Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties agree to the continuance for the following reasons: The Defendant needs more time to reply to Government's Response to Defendant's Motion to Withdraw Plea.
  2. The additional time requested herein is not sought for purposes of delay.
  3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the reply deadline.

## **CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

The continuance sought herein is excusable under the Speedy Trial Act, title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B(i), (iv).

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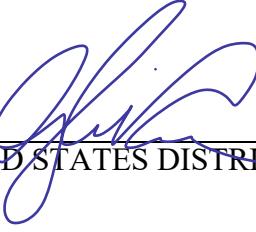
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**ORDER**

IT IS THEREFORE ORDERED that Defendant's reply is due August 28, 2017.

DATED this 17 day of August 2017.

  
UNITED STATES DISTRICT JUDGE